

CENTENNIAL COMMUNICATIONS

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August 3, 2005

Kris Monteith, Acting Chief
Enforcement Bureau
Federal Communications Commission
445 12th Street, SW
Room 7-C723
Washington, DC 20554

Catherine W. Seidel, Acting Chief
Wireless Telecommunications Bureau
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

**Re: Tenth Quarterly Report of Centennial Communications Corp.
On E911 Compliance**

Dear Ms. Monteith and Ms. Seidel:

Pursuant to the FCC's Order to Stay issued in CC Docket No. 94-102,¹ and the request of Commission staff, Centennial Communications Corp. ("Centennial") hereby voluntarily files this tenth Quarterly Report detailing our progress in deploying Phase I and Phase II enhanced 911 ("E911") service in our markets. Centennial filed its last quarterly progress report on March 25, 2004. Because Centennial provides CMRS service both in and outside of the continental United States, this report is divided into two sections -- the first explaining the status of Phase II E911 deployment in Puerto Rico, and the second part reports on Phase II E911 deployment in our domestic markets. In addition, we are attaching the Excel spreadsheet detailing our E911 implementation status.²

I. Puerto Rico/U.S. Virgin Islands

Centennial Puerto Rico License Corp., a subsidiary of Centennial, holds the B block broadband PCS license for MTA 25 -- Puerto Rico/US Virgin Islands.

¹ FCC 02-210, released July 26, 2002.

² See *Public Notice, Wireless Telecommunications Bureau Standardizes Carrier Reporting on Wireless E911 Implementation*, DA 03-1902, released June 6, 2003.

Centennial has chosen a network-based solution to deploy Phase II E911 in this MTA. A single PSAP serves Centennial's entire Puerto Rican service area. On November 4, 2003, Centennial received a request for Phase I and II E911 service from this sole PSAP. Centennial and the PSAP had been working towards deploying both Phase I and Phase II E911 service in Puerto Rico by July 15, 2004. However due to persistent equipment compatibility problems between Centennial and the PSAP, the parties agreed to extend the Phase II deployment target until August 20, 2004. At this time, both Phase I and Phase II service have been implemented.

Centennial also provides service to the U.S. Virgin Islands of St. Croix and St. Thomas under its B Block license for MTA 25. Each island is served by a single PSAP; however neither PSAP has made a request to Centennial for either Phase I or Phase II E911 service.

II. Domestic Markets

Through five different subsidiaries,³ Centennial holds licenses to provide digital cellular service in 30 markets in the Midwest and Southern United States. Centennial provides cellular service in the following six states: Indiana, Louisiana, Michigan, Mississippi, Ohio and Texas. Centennial has chosen a network-based solution offered by Andrew Corporation to deploy Phase II E911 in its domestic markets.⁴

Phase I Service – Centennial continues to make significant progress initiating Phase I service to PSAPs. As we have previously reported, Centennial continues to receive PSAP requests for Phase I E911 service and we continue to implement Phase I service as valid requests are received. Phase I E911 service has been fully deployed in our Texas markets, and Phase I E911 service has been fully deployed to all PSAPs in Indiana and Louisiana where Centennial operates and for which requests have been submitted. Since we filed our last progress report, we have also activated Phase I service in Evangeline and Sabine Parishes in Louisiana. At present, we still have not received any valid requests for Phase I E911 service from PSAP's in the state of Ohio.

³ Baucé Communications of Beaumont, Inc., Centennial Michiana License Company LLC, Centennial Southeast License Company LLC, Elkhart Metronet, Inc. and Lafayette Cellular Telephone Company.

⁴ See Centennial Communications Corp. Amended Report on E911 Reporting Requirements, filed September 9, 2002.

Since the last progress report, Centennial commercially launched its new 1900 MHz GSM service in the Grand Rapids/Lansing, Michigan market. This is Centennial's first commercial offering in the six counties that comprise this market (Clinton, Eaton, Ingham, Ionia, Kent and Ottawa). With this service launch, Centennial activated Phase I service in Clinton County, Eaton County, East Lansing and in Lansing/Ingham County, MI.

Phase II Service - As we have previously advised the Commission, we are implementing Andrew Corporation's "Geometrix" network overlay solution for E911 Phase II compliance in our domestic markets. As detailed in the attached Excel spreadsheet, since the filing of our last quarterly report, Centennial has activated Phase II service to eleven new PSAPs (IN: Adams County, Grant County Sheriff's Office, Huntington County Sheriff's Office, Pulaski County Sheriff's Office, Starke County Sheriff's Office, Tipton County Sheriff's Office, and Wabash County Sheriff's Office. LA: St. Landry Parish. MI: Jackson County Sheriff's Office, Lenawee County Sheriff's Office and Montcalm County Sheriff's Office.) In total, we have integrated sixty-five PSAPs to "Live" Phase II status. In addition, we have seventeen markets in various stages of the implementation process. From all indications, we expect to receive three Phase II request for service in Michigan in the upcoming quarter. In May, we received valid requests for Phase II service from several of the PSAPs that we serve in Texas, and we anticipate deploying Phase II service in those markets by November 2005. During May and June 2005, Centennial also received valid Phase II requests from five PSAPS within our new Grand Rapids/Lansing market. Additionally, within this new market, Centennial received a formal Phase II request from one of the Michigan PSAPs more than three months prior to our commercial launch of GSM service. We are planning for Phase II deployment for all of these markets in the November/December, 2005 timeframe.

Most of the technical issues associated with GSM Phase II testing have been resolved and service implemented in all of our Midwestern markets. In addition, Centennial had to replace the existing Andrew Abis Monitoring Unit (AMU) in early May 2005 in order to resolve on-going testing problems in Louisiana. We have requested new trunk types (ISUP) to replace the existing MF trunks in our Southeastern markets in order to integrate GSM testing in the four Louisiana Phase II markets. The trunk replacement program is 95% complete. GSM integration for Louisiana, Mississippi, and Texas is scheduled to start the first week of August.

As of the date of this report, Centennial still has not received any Phase II E911 service requests from PSAPs in Mississippi or Ohio. Centennial continues to negotiate mutually acceptable deployment target dates with each PSAP that has submitted a valid request for Phase II service when circumstances dictate that

deployment cannot be accomplished within six months from our receipt of a valid request. In addition, we continue to work cooperatively with these PSAPs when we encounter issues that result in delays to the previously-negotiated mutually acceptable deployment dates.

In sum, because Centennial has negotiated mutually acceptable Phase II implementation schedules with each of the PSAPs in its domestic markets that had submitted valid Phase II requests,⁵ Centennial presently is in compliance with all applicable Phase II deployment benchmarks.

III. Affidavit

I hereby declare under penalty of perjury that the information provided in this response is true and accurate to the best of my knowledge, information and belief.

⁵ See *Order on Reconsideration, Revision of the Commission's Rules to Ensure Compatibility with Enhanced 911 Emergency Calling Systems, Petition of City of Richardson, Texas*, FCC 02-318, released November 26, 2002

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If you have any questions regarding this report, or require additional information, please contact me, or Terry Cavanaugh at Cole, Raywid & Braverman, LLP, counsel for Centennial, at 202-828-9857.

Sincerely,

/s/ William Roughton

William Roughton
Vice President, Legal and Regulatory

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